

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

Case No. 1:03-md-01570-GBD-SN

*This document relates to:*

*The Underwriting Members of Lloyd's  
Syndicate 2, et al. v. Al Rajhi Bank, et al.,  
No. 16-cv-7853; Beazley Furlonge Ltd., et al.  
v. Kingdom of Saudi Arabia, et al., No. 16-cv-  
07456; Aguilar, et al. v. Kingdom of Saudi  
Arabia, et al., No. 16-cv-09663; Addesso, et al.  
v. Kingdom of Saudi Arabia, et al., No. 16-cv-  
09937; Hodges, et al. v. Kingdom of Saudi  
Arabia, et al., No. 17-cv-00117; Aiken, et al. v.  
Kingdom of Saudi Arabia, et al., No. 17-cv-  
00450; Charter Oak Fire Insurance Co., et al.  
v. Al Rajhi Bank, et al., No. 17-cv-02651;  
Abarca, et al., v. Kingdom of Saudi Arabia, et  
al., No. 17-cv-03887; Arrowood Indemnity  
Co., et al. v. Kingdom of Saudi Arabia, et al.,  
No. 17-cv-03908; Abedhajajreh v. Kingdom of  
Saudi Arabia, et al., No. 17-cv-06123; Fraser,  
et al. v. Al Qaeda Islamic Army, et al., No. 17-  
cv-07317; Muenchener Rueckversicherungs-  
Gesellschaft Aktiengesellschaft in Muenchen,  
et al. v. Kingdom of Saudi Arabia, et al.,  
No. 17-cv-07914; and Abbate, et al. v.  
Kingdom of Saudi Arabia, et al., No. 17-cv-  
08617.*

**NOTICE OF JOINT MOTION  
FOR ENTRY OF JUDGMENTS UNDER RULE 58(d) AND  
FOR ENTRY OF PARTIAL FINAL JUDGMENTS UNDER RULE 54(b)**

PLEASE TAKE NOTICE that, pursuant to Rules 54(b) and 58(d) of the Federal Rules of  
Civil Procedure and Local Civil Rule 7.1, Al Rajhi Bank, National Commercial Bank, and Saudi

Binladin Group (collectively, “Defendants”), and Plaintiffs in all of the above-captioned cases (other than Plaintiffs in *Charter Oak Fire Insurance Co., et al. v. Al Rajhi Bank, et al.*, which do not oppose this Motion, and Plaintiffs in *Fraser, et al. v. Al Qaeda Islamic Army, et al.*, which have not stated their position in response to the request of Defendant National Commercial Bank), hereby appear for the purpose of moving the Court, before the Honorable George B. Daniels, United States District Judge, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for the following relief:

- (i) Direct the Clerk to enter judgment, pursuant to Rule 58(d) of the Federal Rules of Civil Procedure, in *The Underwriting Members of Lloyd’s Syndicate 2, et al. v. Al Rajhi Bank, et al.*, No.16-cv-7853;
- (ii) Extend the Court’s March 28, 2018 Memorandum Decision and Order (ECF No. 3947) dismissing the claims against Defendants Al Rajhi Bank, National Commercial Bank, and Saudi Binladin Group to include dismissal of the claims brought against these Defendants in *Abbate, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-08617, and direct the Clerk to note in that docket that the case is “Terminated” as to Al Rajhi Bank, National Commercial Bank, and Saudi Binladin Group as of March 28, 2018;
- (iii) Certify as final the Court’s March 28, 2018 Memorandum Decision and Order (ECF No. 3947) and direct to the Clerk to enter partial final judgments, pursuant to Rule 54(b) of the Federal Rules of Civil Procedure, in favor of Defendants Al Rajhi Bank, National Commercial Bank, and Saudi Binladin Group in the following cases: *Aguilar, et al. v. Kingdom of Saudi Arabia, et al.*, No. 16-cv-

09663; *Addesso, et al. v. Kingdom of Saudi Arabia, et al.*, No. 16-cv-09937; *Hodges, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-00117; *Aiken, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-00450; *Charter Oak Fire Insurance Co., et al. v. Al Rajhi Bank, et al.*, No. 17-cv-02651; *Abarca, et al., v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-03887; *Arrowood Indemnity Co., et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-03908; *Abedhajajreh v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-06123; *Muenchener Rueckversicherungs-Gesellschaft Aktiengesellschaft in Muenchen, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv- 07914; and *Abbate, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-08617;

- (iv) Certify as final the Court's March 28, 2018 Memorandum Decision and Order (ECF No. 3947) and direct to the Clerk to enter partial final judgment, pursuant to Rule 54(b) of the Federal Rules of Civil Procedure, in favor of Defendant National Commercial Bank in *Fraser, et al. v. Al Qaeda Islamic Army, et al.*, No. 17-cv-07317; and
- (v) Direct the Clerk to note in the docket of *Beazley Furlonge Ltd., et al. v. Kingdom of Saudi Arabia*, No. 16-cv-07456, that the case is "Terminated" as to Al Rajhi Bank, National Commercial Bank, and Saudi Binladin Group as of May 4, 2017.

A memorandum of law in support of this Joint Motion is filed herewith.

Dated: June 20, 2018

Respectfully submitted,

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### CERTIFICATE OF SERVICE

I hereby certify that, on June 20, 2018, I caused an electronic copy of the foregoing document to be served electronically by the Court's Electronic Case Filing (ECF) System on the consolidated MDL docket and the individual dockets for the following consolidated cases:

*The Underwriting Members of Lloyd's Syndicate 2, et al. v. Al Rajhi Bank, et al.*,  
No. 16-cv-7853  
*Beazley Furlonge Ltd., et al. v. Kingdom of Saudi Arabia, et al.*, No. 16-cv-07456  
*Aguilar, et al. v. Kingdom of Saudi Arabia, et al.*, No. 16-cv-09663  
*Addesso, et al. v. Kingdom of Saudi Arabia, et al.*, No. 16-cv-09937  
*Hodges, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-00117  
*Aiken, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-00450  
*Charter Oak Fire Insurance Co., et al. v. Al Rajhi Bank, et al.*, No. 17-cv-02651  
*Abarca, et al., v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-03887  
*Arrowood Indemnity Co., et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-03908  
*Abedhajajreh v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-06123  
*Fraser, et al. v. Al Qaeda Islamic Army, et al.*, No. 17-cv-07317  
*Muenchener Rueckversicherungs-Gesellschaft Aktiengesellschaft in Muenchen, et al. v.*  
*Kingdom of Saudi Arabia, et al.*, No. 17-cv- 07914  
*Abbate, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-08617

Dated: June 20, 2018

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